

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CHRISTOPHER KOHLS and MARY
FRANSON,

Plaintiffs,

v.

KEITH ELLISON, in his official
capacity as Attorney General of
Minnesota, and CHAD LARSON, in
his official capacity as County
Attorney of Douglas County,

Defendants.

Court File No. 0:24-cv-3754- LMP-DLM

**STIPULATION FOR STAY OF
DISTRICT COURT
PROCEEDINGS PENDING
RESOLUTION OF
PLAINTIFFS' APPEAL**

The above-captioned parties, by their attorneys, hereby stipulate as follows:

1. Plaintiff filed this action on September 27, 2024. (ECF No. 1.)
2. Plaintiff's Summons and Complaint were served upon the Minnesota Attorney General's Office and the Douglas County Attorney's Office care of the County Auditor's Office on October 2, 2024.¹ (ECF No. 8.)
3. The Court heard the Plaintiffs' motions for preliminary injunction and motion to exclude certain expert testimony on December 17, 2023, and resolved those motions on January 10, 2025, subsequently entering judgment. (ECF Nos. 46-48.)

¹ Defendant Larson reserves all arguments regarding service.

4. On February 7, 2025, Plaintiffs filed their notice of appeal of this Court's January 10, 2025 orders and judgment. (ECF No. 52.)

5. The parties agree that Plaintiffs' appeal is likely to resolve some of the contested legal issues in dispute in this matter, and the remaining issues before the District Court are sufficiently intertwined with the issues on appeal.

6. The parties have stipulated to this stay in good faith and not for the purpose of unduly delaying the resolution of this matter.

7. The stay serves the interests of private and judicial economy. The parties likewise agree that it is most economical to stay the pre-trial conference and discovery until the appeal is resolved.

WHEREFORE, the parties respectfully request that the Court enter an Order staying further District Court proceedings in this matter pursuant to the Court's inherent authority to do so, until the Plaintiffs' appeal has been resolved by the Court of Appeals, and the time for any further reconsideration or appeal has expired, or until further order of this Court.

FOR THE PLAINTIFFS:

UPPER MIDWEST LAW CENTER

Douglas P. Seaton (#127759)
James V. F. Dickey (#393613)
Alexandra K. Howell (#0504850)
12600 Whitewater Drive, Suite 140
Minnetonka, MN 55343
Voice: 612-428-7000
Email: Doug.Seaton@umlc.org
James.Dickey@umlc.org
Allie.Howell@umlc.org

**HAMILTON LINCOLN LAW
INSTITUTE**

/s/ M. Frank Bednarz
M. Frank Bednarz (*pro hac vice*)
1440 W. Taylor St. # 1487
Chicago, IL 60607
Voice: 801-706-2690
Email: frank.bednarz@hlli.org

ATTORNEYS FOR PLAINTIFFS
CHRISTOPHER KOHLS
AND MARY FRANSON

FOR THE DEFENDANTS:

KEITH ELLISON
State of Minnesota
Attorney General

/s/ Peter Farrell
Liz Kramer (#0325089)
Solicitor General
Peter J. Farrell (#0393071)
Deputy Solicitor General
Angela Behrens (#0351076)
Allen Cook Barr (#0399094)
Assistant Attorneys General
445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1010 (Voice)
Email: liz.kramer@ag.state.mn.us
peter.farrell@ag.state.mn.us
angela.behrens@ag.state.mn.us
allen.barr@ag.state.mn.us

ATTORNEYS FOR KEITH ELLISON

**SQUIRES, WALDSPURGER &
MACE, P.A.**

/s/ Kristin C. Nierengarten
Kristin C. Nierengarten (#395224)
Zachary J. Cronen (#397420)
333 South Seventh Street, Suite 2800
Minneapolis, MN 55402
Phone: (612) 436-4300
Fax: (612) 436-4340
Email: kristin.nierengarten@raswlaw.com
zachary.cronen@raswlaw.com

ATTORNEYS FOR DEFENDANT
CHAD LARSON